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TRANSPORTATION SERVICES

July 28, 2000

75A.98.4042127

Mr. Robert A. McGuire
Acting Associate Administrator for Hazardous Material Safety
Research & Special Programs Administration
U.S. Department of Transportation
400 7th Street, SW
Washington, D.C. 20590-0001

Request for Renewal of Exemption DOT E-12095

Dear Mr. McGuire:

This is to request renewal of our party status to DOT Exemption 12095 in accordance with 49 CFR 107.109. This exemption authorizes an alternative qualification program for all DOT specification tank cars and for non-DOT specification tank cars used for the transportation of hazardous materials in commerce. This renewal is required while FRA works to incorporate this exemption into the regulations.

This request for renewal is for:

Phillips Petroleum Company 338 Adams Bldg Bartlesville Ok, 74004

Contact:

Jeff Angle

Phone:

918-661-6401

Fax:

918-662-2869

E:Mail:

jeangle@ppco.com

The Railway Progress Institute (RPI) submitted the original application for this exemption on May 5, 1998. The third revision of this exemption, issued on September 30, 1998, remains accurate and complete.

Phillips Petroleum Company has not qualified any of the cars we own under this exemption since its issuance in October 1998 and is therefore not aware of any incidents involving any loss of contents related to tank car requalification under this exemption. Industry data shows that the North American tank car fleet averages more than 9 loaded trips per car per year. Phillips Petroleum Company is aware of no incidents involving any loss of contents related to tank car qualification under this exemption

We believe this application is complete and conforms to the requirements of 49 CFR 107.109. Please call Jeff Angle at 918-661-6401 if you need additional information.

Sincerely

Jeff Angle

Rail Maintenance Specialist

CC: Jim Rader - FRA